

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ALASKA ELECTRICAL PENSION FUND;  
GENESEE COUNTY EMPLOYEES'  
RETIREMENT SYSTEM; COUNTY OF  
MONTGOMERY, PENNSYLVANIA;  
COUNTY OF WASHINGTON,  
PENNSYLVANIA; and CITY OF NEW  
BRITAIN, CONNECTICUT, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

vs.

BANK OF AMERICA CORPORATION;  
BARCLAYS BANK PLC; B.N.P. PARIBAS  
SA; CITIGROUP INC.; CREDIT SUISSE  
AG, NEW YORK BRANCH; DEUTSCHE  
BANK AG; THE GOLDMAN SACHS  
GROUP, INC.; HSBC BANK PLC; ICAP  
CAPITAL MARKETS LLC; JPMORGAN  
CHASE & CO.; MORGAN STANLEY & CO.  
LLC; NOMURA SECURITIES  
INTERNATIONAL, INC.; ROYAL BANK  
OF SCOTLAND PLC; UBS AG; and WELLS  
FARGO BANK, N.A.,

Defendants.

Case Nos.: 14-cv-7126 (JMF)  
14-cv-7907 (JMF)  
14-cv-8342 (JMF)  
14-cv-8365 (JMF)  
14-cv-8576 (JMF)

Hon. Jesse M. Furman

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT  
AGREEMENTS WITH BANK OF AMERICA, N.A.; BARCLAYS BANK PLC;  
CITIGROUP INC.; CREDIT SUISSE AG, NEW YORK BRANCH; DEUTSCHE BANK  
AG; JPMORGAN CHASE & CO. LLC; AND ROYAL BANK OF SCOTLAND, PLC**

PLEASE TAKE NOTICE that upon the filing of the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Settlement Agreements with Bank of America, N.A.; Barclays Bank PLC; Barclays Capital Inc.; Citigroup Inc.; Credit Suisse AG, New York Branch; Deutsche Bank AG; JPMorgan Chase & Co. LLC; and Royal Bank of Scotland, PLC, and all papers and pleadings submitted therewith, Plaintiffs, through their undersigned counsel, hereby move this Court before the Honorable Jesse M. Furman, U.S.D.J., for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure:

- (1) preliminarily approving the Settlements<sup>1</sup> set forth in the Settlement Agreements;
- (2) preliminarily certifying the following Settlement Class for purposes of settlement only:

all Persons or entities who entered into, received or made payments on, terminated, transacted in, or held an ISDAfix Instrument during the Settlement Class Period [January 1, 2006 through January 31, 2014]. Excluded from the Settlement Class are Defendants and their employees, affiliates, parents, subsidiaries, and co-conspirators, should any exist, whether or not named in the Amended Complaint, and the United States Government, and all of the [Released Bank Parties]; provided, however, that Investment Vehicles shall not be excluded from the definition of the Settlement Class;
- (3) preliminarily appointing Robbins Geller Rudman & Dowd LLP; Scott+Scott, Attorneys at Law, LLP; and Quinn Emanuel Urquhart & Sullivan LLP as class counsel for the Settlement Class for purposes of settlement only;
- (4) preliminarily appointing Plaintiffs Alaska Electrical Pension Fund; City of New Britain, Connecticut; Genesee County Employees' Retirement System; County of Montgomery, Pennsylvania; and County of Washington, Pennsylvania as class representatives for the Settlement Class for purposes of settlement only;
- (5) appointing Epiq Systems, Inc. as Claims Administrator;
- (6) appointing Lead Counsel as the Escrow Agent;
- (7) staying all proceedings in the Action and any other action alleging any claims released by the Settlement Agreements with respect to Settling Defendants; and

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<sup>1</sup> Unless otherwise defined herein, all other capitalized terms have the same meaning as set forth in the Settlement Agreements and the Explanation of Defined Terms and Citation Forms in the accompanying Memorandum of Law.

(8) granting such other and further relief as the Court deems just and proper.

DATED: May 3, 2016

Respectfully submitted,

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*Co-Lead Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 3, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

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